Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of Petition for Declaratory Ruling to the Iowa Utilities Board and Contingent Petition for Preemption	WC Docket No. 09-152

REPLY COMMMENTS OF AVENTURE COMMUNICATION TECHNOLOGY, LLC IN SUPPORT OF GREAT LAKES COMMUNICATIONS CORPORATION AND SUPERIOR TELEPHONE COOPERATIVE'S PETITION FOR PREEMPTION AND DECLARATORY RULING REGARDING THE FINAL ORDER OF THE IOWA UTILITY BOARD

Paul Lundberg
Attorney at Law
906 Terra Centre
Sioux City, IA 51101
712-234-3030

Jonathan E. Canis
Marcia Fuller Durkin
Arent Fox LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036
202-775-5738
canis.jonathan@arentfox.com
durkin.Marcia@arentfox.com

Counsel to
Aventure Communications Technology, LLC

Dated: October 6, 2009

SUMMARY

Aventure Communication Technology, LLC submits its Reply to comments on the Petition for Declaratory Ruling to the Iowa Utilities Board and Contingent Petition for Preemption submitted by Great Lakes Communications and Superior Telephone Cooperative ("Great Lakes/Superior Petition"). The IUB issued its Final Order on the same day that the Commission received comments to determine whether it should take action to restrict the IUB's ability to issue such an order. In any event, the Final Order presents an even more compelling case for preempting the IUB's Order and for providing the Declaratory Ruling relief requested by the Great Lakes/Superior Petition and by Aventure's initial Comments.

There is a compelling need for the Commission to provide broad, comprehensive guidance to the industry. Aventure has four access collection actions pending in courts, stayed until the Commission takes further action.

The IUB Final Order is inherently flawed and merits preemption. A review of the Order shows that it contains even more errors of fact and law than the Adopted Ruling that was the focus of Aventure's initial comments. Aventure provides charts showing how the IUB Final Order conflicts with applicable Commission precedent, and how the IUB Order uncritically adopts arguments wholesale from the Qwest briefs. Aventure also identifies two areas in which the IUB Final Order is demonstrably wrong on the facts and internally inconsistent.

Finally, Aventure offers the following respons to specific arguments raised by other parties in their initial Comments:

- AT&T's reference to the Commission's *Intellicall* decision is inapposite, and cannot support AT&T's claim that that decision somehow invalidates the *Farmers and Merchants* decision and other relevant precedent.
- The IUB simply misreads the Commission's rules when it asserts that it has Commission-delegated authority to terminate live service and order the "reclamation" of telephone numbers.
- The IUB misses the unambiguous provision in § 1.106(n) of the Commission's rules, which unequivocally states that a Commission order is not stayed when a petition for reconsideration is filed.
- The IUB asserts that Petitioners advance a "novel" and "unsupported" argument that the Commission can "occupy the field" of proposed regulation, and has done so in the case of "traffic stimulation" by opening its rulemaking proceeding in WCB Docket No. 07-135. In fact, this application of the Commission's authority is not novel, and is fully described in the Supreme Court's seminal *Lousiana PSC* decision.

For these reasons, the Commission should preempt the IUB Final Order as soon as practicable, and should issue the Declaratory Rulings requested by the Great Lakes/Superior Petition and by Aventure in its initial Comments.

TABLE OF CONTENTS

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of Petition for Declaratory Ruling to the Iowa Utilities Board and Contingent Petition for Preemption	WC Docket No. 09-152

REPLY COMMMENTS OF AVENTURE COMMUNICATION TECHNOLOGY, LLC IN SUPPORT OF GREAT LAKES COMMUNICATIONS CORPORATION AND SUPERIOR TELEPHONE COOPERATIVE'S PETITION FOR PREEMPTION AND DECLARATORY RULING REGARDING THE FINAL ORDER OF THE IOWA UTILITY BOARD

Aventure Communication Technology, L.L.C. ("Aventure"), by its undersigned counsel and pursuant to the Commission's Public Notice dated August 20, 2009,[1] hereby submits its reply comments in further support of the Petition for Declaratory Ruling to the Iowa Utilities Board and Contingent Petition for Preemption, submitted by Great Lakes Communications Corporation ("Great Lakes") and Superior Telephone Cooperative ("Superior") ("Great Lakes/Superior Petition").[2] On September 21, 2009, Aventure filed Comments[3] in support of the Great Lakes/Superior Petition, urging the Commission to grant the Declaratory Ruling relief sought by the Great Lakes/Superior Petition—confirming that "all matters relating to interstate access charges, including the rates therefore and revenues derived therefrom are within [the Commission's] exclusive federal jurisdiction and thus any attempts by state authorities to

---

1 Public Notice, DA 09-1843 (rel. Aug. 20, 2009).

2 Petition for Declaratory Ruling to the Iowa Utilities Board and Contingent Petition for Preemption by Great Lakes and Superior, filed August 14, 2009 in WC Docket No. 09-152 ("Petition"), see Public Notice, DA 09-1843 (rel. Aug. 20, 2009).

3 Comments of Aventure Communications Technology, LLC Supporting Clarification of the Commission's Rules and Policies Relating to the Iowa Utility Board's Adopted Decision ("Aventure's Comments").

regulate interstate access charges are beyond their authority."[4] Aventure further urged the Commission to use this opportunity to issue a broader Declaratory Ruling that would settle multiple federal court and state regulatory commission actions pending across the country, all of which address the same service applications and the same legal and policy questions addressed by the IUB.

As previously noted, the Great Lakes/Superior Petition addresses a set of findings recently adopted by the Iowa Utilities Board ("IUB") at a Decision Meeting conducted by the IUB on August 14, 2009 in a complaint proceeding in which Qwest, Sprint, and AT&T asserted that eight local exchange carriers ("LECs") had improperly assessed terminating access charges. Since the filing of Aventure's comments, the IUB, on the very day comments regarding whether to quash its prospective order were due to the FCC, filed its Final Order in that complaint proceeding.[5] *See* Final Order, *Qwest Commc'ns Corp. v. Superior Tel. Coop., et al.*, IUB Docket No. FCU-07-2 (issued Sept. 21, 2009) ("the IUB Final Order"). Aventure is perplexed by the IUB's timing in filing the IUB Final Order the same day that the Commission set as the deadline for receiving comments on the Great Lakes/Superior Petition. Moreover, based on Aventure's review of the IUB Final Order, it is now even clearer that the Commission needs to both preempt the Final Order and provide a comprehensive resolution to the issues raised in the litigations across the country. Accordingly, Aventure supports the Great Lakes/Superior Petition and urges the Commission to preempt the IUB Order and address all related issues in a single Declaratory Ruling of industry-wide application.

---

[4] Petition for Declaratory Ruling to the Iowa Utilities Board and Contingent Petition for Preemption by Great Lakes and Superior, filed August 14, 2009, and docketed in WC Docket No. 09-152 ("Great Lakes/Superior Petition").

[5] *Qwest Commc'ns Corp. v. Superior Tel. Coop., et al.*, IUB Docket No. FCU-07-2.

I. WITH ISSUES IDENTICAL TO THOSE DECIDED BY THE IUB PENDING BEFORE STATE REGULATORS AND FEDERAL COURTS ALIKE, IT IS ESSENTIAL THAT THE COMMISSION CLARIFY THE LAW

Currently pending before federal courts and various state regulatory commissions across the nation are more than 17 actions—all addressing the issue of whether IXCs who terminate customer calls to conferencing services and chat-line providers[6] are obligated to pay rural LEC providers' termination fees for those calls. With so many cases pending, absent Commission leadership, it is virtually certain that inconsistent and contradictory rulings will emerge. Accordingly, Aventure urges the Commission to clarify the law through a Declaratory Ruling.

As noted in Aventure's Comments, Aventure is an Iowa corporation that provides the full range of local and long-distance telephone services to business and residential customers in rural communities in Iowa. For the past three years, Aventure has been one of many rural LECs enmeshed in a bitter dispute in the IUB involving several IXCs who have refused to pay for the access services provided.

In addition to its involvement in the IUB proceeding, Aventure also has four pending collection actions against AT&T, Qwest, Sprint, and Verizon, in federal district courts in both New York and Iowa. Throughout these collection actions, which have now been pending for up to three years, Aventure has expended significant time and monies seeking to obtain payments from IXCs who have engaged in unlawful self-help through their refusal to pay access charges. As noted Aventure's comments, its collection actions have all been stayed until the Commission takes decisive action in the *Farmers &*

---

[6] In some cases the claims also relate to providers of international calling services.

Merchants case.[7] Some of the other courts, confused by the lack of direction given by the Commission, have referred part or all of their cases to the Commission to resolve.[8]

Since 2000, the Commission has responded to similar allegations by opening enforcement proceedings, and reaching conclusions regarding individual cases. In total, the Commission has now ruled **four** times in favor of the rural LECs and against the IXCs, all disputes over the same calls to conference and chat providers.[9] Aventure urges the Commission to quiet the issue once and for all. Rather than individually settle these cases through narrow enforcement orders, the Commission needs to both preempt the IUB Final Order and issue a Declaratory Ruling that comprehensively confirms the current state of the law. This proceeding is the proper vehicle for that action.

II. THE IUB FINAL ORDER CONTAINS SO MANY FACTUAL AND LEGAL FLAWS THAT IT MUST BE PREEMPTED

Upon review of the IUB's Final Order, it is clear that while the IUB Final Order closely matches the Adopted Decision, it contains even more flaws and erroneous conclusions. As the IUB held in its August 14, 2009 Decision Meeting, the IUB Final Order demonstrates that the IUB has exceed its authority by issuing an order that directly addresses the regulations of interstate and international access charges. Such overstepping is most clearly demonstrated by a comparison of the conclusions reached by the IUB with prior Commission precedent which directly conflicts with those conclusions.

---

[7] *Qwest Commc'ns. Corp. v. Farmers and Merchants Mut. Tel. Co.*, Memorandum Opinion and Order, 22 FCC Rcd 17973 (2007) ("*Farmers & Merchants*").

[8] *All American Tel. Co. Inc. v. AT&T Corp.*, No. 07 Civ 861, 2009 WL 691325, at *4 (S.D.N.Y. Mar. 16, 2009); *Tekstar Commc'ns., Inc. v. Sprint Commc'ns. Co., L.P.*, No. 08-cv-01130 (D. Minn) (July 15, 2009).

[9] *AT&T Corp. v. Jefferson Tel. Co.*, Memorandum Opinion and Order, 16 FCC Rcd 16130 (2001) ("*Jefferson*"); *AT&T Corp. v. Frontier Commc'ns. of Mt. Pulaski, Inc.*, Memorandum Opinion and Order, 17 FCC Rcd 4041(2002); *AT&T v. Beehive Tel. Co.*, Memorandum Opinion and Order, 17 FCC Rcd 11641 (2002); and *Farmers & Merchants*.

IUB FINAL ORDER	OPPOSING FCC PRECEDENT
Free Conference Calling Service Companies are not considered "End Users" under the terms of the respective tariffs. Final Order at 24, 33, 34, 46, 53, 63, 64, 66, 78 ¶ 2.	Directly contravenes the *Farmers and Merchants* decision, interpreting identical tariff language. 22 FCC Rcd at 17987, ¶ 38.
The LEC traffic did not terminate at the end user's premises since the conference companies did not own or lease or otherwise control the premises where the conferencing equipment was installed. Final Order at 37-40, 53, 78 ¶ 10.	Directly contravenes the *Farmers and Merchants* decision, interpreting identical tariff language. 22 FCC Rcd at 17986, ¶¶ 33-34.
The conference companies were treated business partners in a joint business venture rather than end users. Final Order at 33, 34, 78 ¶ 6.	Directly contravenes the *Farmers and Merchants* decision, interpreting identical tariff language. 22 FCC Rcd at 17987, ¶ 38.
Since the conference companies were never end users under the tariffs the tariffs do not apply and thus the filed rate doctrine does not apply. Final Order at 34, 78 ¶ 7.	The Commission found that the identical services were tariffed access charges in *Jefferson, Frontier, Beehive, and Farmers & Merchants.*
Revenue sharing, while not inherently unreasonable *per se,* was unreasonable in this case. Final Order at 33, 57, 78 ¶ 8.	The Commission expressly rejected the argument that identical revenue sharing was unreasonable in *Jefferson, Frontier, Beehive, and Farmers & Merchants*, and in *Broadband Internet Access Order*, 20 FCC Rcd at 14899-900.
Conference companies did not subscribe to the Respondents' services because the LECs did not bill conferencing companies for service. Final Order at 24-25, 31-32, 34, 66, 77 ¶1.	Directly contravenes the *Farmers and Merchants* decision, interpreting identical tariff language. 22 FCC Rcd at 17987, ¶ 38.

Clearly, the IUB Final Order is nothing short of a blatant disregard for Commission precedent. Instead of following *Jefferson* and its progeny, the IUB purposefully created a conflict between state and federal law. Such an approach clearly plays directly into the hands of the IXCs.

Unsurprisingly, further review of the findings of fact adopted in the IUB Final Order show striking similarities between the IUB Final Order Findings and the findings

of fact improperly presented to the IUB by Qwest several months ago. (Attached as Exhibit B to Aventure's Comments.) Although the IUB claimed that it did not consider Qwest's inappropriate filing,[10] a side by side comparison of the sets of findings demonstrates otherwise.

QWEST'S FINDINGS OF FACT	FINAL ORDER FINDINGS OF FACT
FCSCs are not End Users of the LECs. Qwest FF&CL No. 9.	"FCSCs are not end users as defined by the Respondents' tariffs." Final Order at 78 ¶ 2. *See also* Final Order at 24, 33, 34, 46, 53, 63, 64, 66.
No FCSC calls were terminated to an End User's premises. Qwest FF&CL No. 10.	"The intrastate toll traffic did not terminate at the end user's premises." Final Order at 78 ¶ 10. *See also* Final Order at 37-40, 53.
FCSCs are business partners of LECs. Qwest FF&CL No. 8.	"The Respondents and FCSCs acted as business partners." Final Order at 78 ¶ 6. *See also* Final Order at 33, 34.
The services that LECs provided to FCSCs was not tariffed access service, it was private carriage. Qwest FF&CL No. 9, 12.	"The filed tariff doctrine doe not apply to the Respondents in this case." Final Order at 78 ¶ 7. *See also* Final Order at 34.
Revenue sharing is an unjust and unreasonable practice. Qwest FF&CL No. 21.	"The sharing of revenues between Respondents and FCSCs is not inherently unreasonable, but may be an indication that a particular service arrangement is unreasonable. Final Order at 78 ¶ 8. *See also* Final Order at 33, 57.
FCSCs do not purchase local exchange service from LECs. Qwest FF&CL No. 2.	"The FCSCs did not subscribe to the Respondents' intrastate switched access or local exchange tariffs." Final Order at 77 ¶1. *See also* Final Order at 24-25, 31-32, 34, 66 (noting "The Board finds that the lack of timely, legitimate billing for tariffed services by the Respondents demonstrates that the FCSCs did not actually subscribe to a billable tariffed service." Final Order at 24).

The similarities between the two findings of fact are not coincidental but instead demonstrate a further example of how flawed the IUB proceeding was.

[10] *See* Docket No. FCU-07-2, Order Granting Motion to Strike Resubmittal of Excluded Exhibit, Denying Motions to Strike Proposed Findings and Conclusions, Granting Motions to File Overlength Briefs, and Granting Requests for Confidential Treatment, at 5 (IUB July 7, 2009).

Moreover, the IUB Final Order selectively reads the language contained in the rural LECs tariffs in an effort to further adopt in *toto* the language proposed by Qwest. This is specifically demonstrated through the IUB's selective interpretation of the "premises" language contained in the tariffs. The IUB acknowledges that the tariff language defines a premise as a "building or buildings on contiguous property . . . not separated by a public highway" but then proceeds to ignore the plain language of the tariff, and assumes an obligation that the end user must "own or control" the premises. In so doing, the IUB simply ignores the actual language of the LEC tariffs, and imposes a new term advanced by Qwest. IUB Final Order at 36-38. Such selective reasoning stands as a further justification for why the Great Lake/Superior Petition for Preemption should be granted.

The IUB Final Order, distinguished from the conclusions discussed at the Decision Meeting, contained explicit findings specific to Aventure. These findings, like the rest of the IUB Final Order, are deeply flawed and, in some instances, blatantly erroneous. For example, the IUB Final Order requires Aventure to show cause why the IUB should not revoke Aventure's certificate, based on the IUB's assertion that Aventure has "few, if any customers". IUB Final Order at 66. But a mere three pages before that, the IUB cites record evidence that Aventure provides service to 140 "traditional" residential and business customers. IUB Final Order at 64. The IUB never finds that 140 customers is a trivial or inconsequential amount, and so the Order is internally inconsistent and frivolous in its findings. Given the seriousness of the IUB's threat to revoke a certificate, this conduct is clearly arbitrary and capricious, and compels preemption of the Order.

III. RESPONSE TO COMMENTS

The majority of the comments opposing the Great Lake/Superior Petition claimed that the petition was "premature and unwarranted" since the IUB had not yet issued its final order, claiming instead that the petition was speculative and should be disregarded by the Commission until after the IUB submits its Final Order. Comments of Qwest Communications Company, LLC to WC Docket No. 09-152. As explained in detail above, the IUB has now issued its Final Order, and such concerns are now moot. Accordingly, the case is even more compelling for the transformation of the Great Lake/Superior's "Contingent" Petition for Preemption into a Petition for Preemption.

Moreover, although very few of the comments opposing the Great Lake/Superior Petition made substantive arguments, there were several points raised that merit rebuttal. First, AT&T claims that "the Commission has *already* repeatedly rejected the argument that its *Jefferson Telephone et al.* and *Farmers I* decisions foreclose the many pending legal challenges to traffic stimulation schemes." AT&T's Opposition to Petition for Declaratory Ruling to WC Docket No. 09-152. As support for this bald assertion, AT&T cites to the Commission's *InterCall* decision,[11] claiming that the Commission held that *Farmers and Merchants* is inapplicable. In making this argument, however, AT&T merely cites dicta in a case that is not on point. In *InterCall*, the Commission did not invalidate *Farmers and Merchants*, but instead expressly stated that "[n]othing in this order is intended to address issues relating to access charge tariffs or other types of intercarrier compensation." AT&T's reliance on *InterCall* is therefore misplaced.

The Comments of the Iowa Utilities Board to WC Docket No. 09-152 raise several issues. First the Board asserts that the Commission's rules grant it authority to

---

[11] *Request for Review by InterCall, Inc.*, Order, 23 FCC Rcd 10731, ¶ 21 (2008) ("*InterCall*").

reclaim telephone numbers. This argument is belied by the plain language of the Commission's rules. Section 52.15(i)(2) states: "State commissions may investigate and determine whether service providers have activated their numbering resources and may request proof from all service providers that numbering resources have been activated and assignment of telephone numbers has commenced." The plain language of this provision shows that the Commission has delegated to the states the very narrow authority to ascertain whether numbering resources have been put into use, period. The IUB's attempt to arrogate to itself *carte blanche* authority to determine whether numbers already in use are used in a way favored by the IUB, and the power to terminate the usage of such numbers by terminating the service, is nowhere stated or implied in the Commission's rules. The IUB cites no authority for its expansive and baseless interpretation of the Commission's rules, and no such authority exists.

The IUB also contends that the *Farmers and Merchants* decision was stayed when Qwest filed a petition for reconsideration. The IUB cites § 1.106(k)(2) of the Commission's rules. That provision is inapposite, however, and merely states conditions under which the Commission may defer the effectiveness of an order subject to further proceedings. Had the IUB read further in that rule section, however, it would have reached the definitive provision of the rules, which unequivocally states that the submission of a petition for reconsideration does not stay the effect of the subject order:

> (n) Without special order of the Commission, the filing of a petition for reconsideration shall not excuse any person from complying with or obeying any decision, order, or requirement of the Commission, or operate in any manner to stay or postpone the enforcement thereof.

47 C.F.R. § 1.106(n). No such special order was issued by the Commission regarding its

Farmers and Merchants decision, and no stay of that decision was effected. The *Farmers and Merchants* decision is binding law, which the IUB is compelled to follow.

Finally, the IUB contests arguments by Petitioners that, by initiating WCB Docket No. 07-135, the Commission has occupied the field regarding new regulations regarding the termination of access traffic to conference/chat line and other high volume services. The IUB states that "Petitioners cite no authority for this novel proposition." IUB Comments at 10. Apparently, the IUB failed to read Aventure's Comments—Aventure both discussed that the Commission has occupied the field of such regulation, and cited and quoted from the Supreme Court's *Louisiana PSC* decision—one of the seminal decisions regarding jurisdictional matters. Aventure's Comments state:

> Under *Louisiana Public Service Commission v. F.C.C.*, 476 U.S. 355 (1986), a state ruling is subject to preemption if a federal regulator has occupied the field, or if the state action would have the effect of contradicting federal law, would pose a barrier to competitive intrastate or interstate services, would make compliance with federal law impossible, or would be a direct impediment to federal rules and policies.

Aventure's Comments at 13 n.16. The reality of a federal agency occupying the field of potential regulation is neither novel nor unsupported.

IV. CONCLUSION

For the reasons stated herein, Aventure supports Great Lakes' and Superior's Petition and urges the Commission to preempt the IUB Final Order as soon as practicable. The Commission should also issue a Declaratory Ruling unequivocally stating that all matters regarding interstate access services, including rates, tariffs, and revenues, are within the Commission's exclusive jurisdiction and cannot be addressed by state regulatory commissions. In addition, Aventure urges the Commission to expand the Declaratory Ruling to provide a

reaffirmation of the current status of law, based on the Commission's decisions in the *Jefferson, Beehive, Frontier,* and *Farmers and Merchants* cases, as well as its numerous rulings against IXC self-help refusals to pay access charges. Such action is essential in order to quiet the numerous cases currently pending before state regulatory commissions as well as more than 17 pending federal court cases.

Respectfully submitted,

/s/ Paul Lundberg
Paul Lundberg
Attorney at Law
906 Terra Centre
Sioux City, IA 51101
712-234-3030

Jonathan E. Canis
Marcia Fuller Durkin
Arent Fox LLP
1050 Connecticut Ave., N.W.
Washington, D.C. 20036
202/775-5738
canis.jonathan@arentfox.com
durkin.marcia@arentfox.com

Counsel to Aventure Communication Technology, L.L.C.

Dated: October 6, 2009

CERTIFICATE OF SERVICE

I, Julian Stamper, do hereby certify that the foregoing **REPLY COMMMENTS OF AVENTURE COMMUNICATION TECHNOLOGY, LLC IN SUPPORT OF GREAT LAKES PETITION FOR PREEMPTION AND DECLARATORY RULING REGARDING THE FINAL ORDER OF THE IOWA UTILITY BOARD** was sent via email on this 6th day of October 2009 to the following:

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc.
236 Massachusetts Avenue, N.E., Suite 110
Washington, D.C. 20002

Chairman
Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Commissioner
Michael J. Copps
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Commissioner
Robert M. McDowell
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Commissioner
Mignon Clyburn
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Commissioner Meredith Attwell Baker
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Priya Aiyar
Legal Advisor for Wireline Competition
and International Issues to
Chairman Genachowski
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Jennifer Schneider
Broadband, Wireline and Universal Service
Legal Advisor to Commissioner Copps
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Christine Kurth
Legal Advisor, Wireline to
Commissioner McDowell
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Carol Simpson
Acting Legal Advisor, Wireline and
Broadband to Commissioner Clyburn
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Christi Shewman
Acting Legal Advisor for Wireline,
Universal Service, and Consumer Issues
To Commissioner Baker
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Mary Beth Richards, Special Counsel for
FCC Reform to Chairman Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Renee Roland Crittendon, Chief of Staff
and Senior Legal Advisor, Spectrum,
International and Public Safety
Office of Commissioner Clyburn
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Erin A. McGrath, Acting Legal Advisor
for Wireless, International, and Public
Safety Issues to Commissioner Baker
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Austin Schlick, General Counsel
Office of General Counsel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

P. Michele Ellison, Bureau Chief,
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Sharon Gillett, Bureau Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

William Dever, Acting Division Chief
Competition Policy Division
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Albert Lewis, Division Chief
Pricing Policy Division
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

John Hunter, Deputy Division Chief
Pricing Policy Division
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Alexander Starr, Chief
Market Disputes Resolution Division
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Rosemary McEnery, Deputy Chief
Market Disputes Resolution Division
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Lisa Griffin, Deputy Chief
Market Disputes Resolution Division
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Doug Slotten
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Room 5-A361
Washington, DC 20554

Lynne Hewitt Engledow
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Room 5-A361
Washington, DC 20554

Best Copy and Printing, Inc.
Portals II
445 12th Street, SW
Suite CY-B402
Washington, DC 20554

Ross Buntrock, Esquire
Arent Fox LLP
1050 Connecticut Avenue, NW
Washington, DC 20036

/s/ Julian Stamper
Julian Stamper